

ORIGINAL



0000136329

Timothy M. Hogan (004567)  
ARIZONA CENTER FOR LAW  
IN THE PUBLIC INTEREST  
202 E. McDowell Rd., Suite 153  
Phoenix, Arizona 85004  
(602) 258-8850

RECEIVED  
AZ CORP COMMISSION  
DOCKET CONTROL Arizona Corporation Commission  
2012 MAY 3 PM 4 10 DOCKETED

MAY 03 2012

Attorneys for Southwest Energy  
Efficiency Project



**BEFORE THE ARIZONA CORPORATION COMMISSION**

GARY PIERCE, Chairman  
BOB STUMP  
SANDRA D. KENNEDY  
PAUL NEWMAN  
BRENDA BURNS

IN THE MATTER OF THE APPLICATION OF )  
TUCSON ELECTRIC POWER COMPANY FOR )  
APPROVAL OF ITS 2011-2012 ENERGY )  
EFFICIENCY IMPLEMENTATION PLAN )  
)  
)

DOCKET NO. E-01933A-11-0055

**SWEEP COMMENTS**

SWEEP is extremely concerned about the deep cuts to Tucson Electric Power Company's (TEP) existing energy efficiency (EE) programs. These cost-effective EE programs deliver substantial benefits and provide important opportunities that enable customers to gain control over their energy use and reduce their utility bills. SWEEP encourages the Commission to identify and implement a viable solution as soon as possible.

SWEEP's prior comments in this docket, filed on April 9, 2012, documented that in 2012, existing EE programs are being significantly downsized compared with actual 2011 levels. Overall, EE investment is being cut in half from \$11.3 million in 2011 to \$5.6 million in 2012. In addition, investments in almost every existing EE program are being slashed

1 dramatically (with the exception of low income weatherization). As a result, many programs are  
2 already closed or suspended. Furthermore, no new EE programs will be launched.

3 To address this situation, SWEEP is strongly in favor of moving forward with an EE Plan  
4 in a timely manner to assist TEP customers to reduce their utility bills – and to do so long before  
5 the conclusion of TEP’s next general rate case. Specifically, SWEEP is largely in favor of the  
6 Updated EE Plan filed by TEP on May 2, 2012, as a framework that supports the Company’s  
7 efforts to work with and meet the needs of its customers.

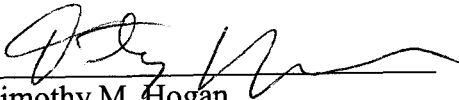
8 For these reasons, SWEEP encourages the Commission to focus the scope of the  
9 evidentiary hearings on the TEP Updated Plan. SWEEP understands that other parties may want  
10 to address additional issues directly related to TEP’s energy efficiency implementation, and they  
11 should be allowed to do so. But the primary focus of the evidentiary hearing should be on the  
12 Updated Plan filed by TEP on May 2, 2012.

13 Focusing the evidentiary hearing on the Updated EE Plan should result in enhanced EE  
14 programs and adequate budgets being available for TEP customers by October 2012, consistent  
15 with TEP’s estimate in its May 2, 2012 filing. In contrast, if the EE implementation plan issues  
16 were deferred to the TEP rate case, customers would not receive the benefits of the Updated Plan  
17 EE programs until mid 2013 at the earliest. Such a delay is not in the interest of TEP customers  
18 and would only further disadvantage customers.

19 In closing, SWEEP recommends that the Commission resolve this issue as soon as  
20 possible *in this docket*, with a focus on the TEP Updated Plan, and *not* in the upcoming TEP rate  
21 case proceeding.

1 RESPECTFULLY SUBMITTED this 3<sup>rd</sup> day of May, 2012.

2 ARIZONA CENTER FOR LAW IN  
3 THE PUBLIC INTEREST

4 By   
5 Timothy M. Hogan  
6 202 E. McDowell Rd., Suite 153  
7 Phoenix, Arizona 85004  
8 Attorneys for Southwest Energy Efficiency  
9 Project

10 ORIGINAL and 13 COPIES of  
11 the foregoing filed this 3<sup>rd</sup> day  
12 of May, 2012, with:

13 Docketing Supervisor  
14 Docket Control  
15 Arizona Corporation Commission  
16 1200 W. Washington  
17 Phoenix, AZ 85007

18 COPIES of the foregoing  
19 Electronically mailed this  
20 3<sup>rd</sup> day of May, 2012 to:

21 All Parties of Record

22   
23  
24  
25